

FILED

JAN 08 2007

**RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND**

1 BARRY J. PORTMAN
Federal Public Defender
2 JOYCE LEAVITT
Assistant Federal Public Defender
3 555 12th Street, Suite 650
Oakland, CA 94607-3627

4 Counsel for Defendant HASSAN
5

6
7 IN THE UNITED STATES DISTRICT COURT
8 FOR THE NORTHERN DISTRICT OF CALIFORNIA
9

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13
14 CARL HASSAN,

15 Defendant.

)
) No. CR 06-00503 DLJ
)
) STIPULATION AND [PROPOSED]
) ORDER FOR CONTINUANCE OF
) CHANGE OF PLEA DATE AND
) EXCLUSION OF TIME UNDER THE
) SPEEDY TRIAL ACT, 18 U.S.C. §
) 3161 ET SEQ.
)

16 IT IS HEREBY STIPULATED, by and between the parties to this action, that the change of
17 plea date in this case, currently scheduled for Friday, January 5, 2007, at 9:00 a.m., before
18 Honorable Judge D. Lowell Jensen, may be continued to Wednesday, January 24, 2007, at 11:30
19 a.m. A continuance to January 24, 2007, will allow time for defense counsel to conduct additional
20 investigation regarding which are relevant to the change of plea. In addition, defense counsel will
21 be out of the country and unavailable from January 6 through January 16, 2007. The parties
22 therefore stipulate that the time from January 5, 2007 to January 24, 2007, should be excluded in
23 accordance with the provisions of the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(8)(A) and (B)(iv)
24 for adequate preparation of counsel in order to allow defense counsel to complete its investigation
25
26

STIP. CONTINUING
CHANGE OF PLEA DATE

1 and for continuity of counsel.

2 /S/

3 DATED: January 4, 2007

4 JOYCE LEAVITT
Assistant Federal Public Defender

5 /S/

6 DATED: January 4, 2007

7 STEPHEN CORRIGAN
Assistant United States Attorney

8 SIGNATURE ATTESTATION

9 I hereby attest that I have on file all holograph signatures indicated by a "conformed" signature ("S/") within this efiled document.


10 **ORDER**

11 GOOD CAUSE APPEARING, IT IS HEREBY ORDERED that the change of plea date in this
12 case, currently scheduled for Friday, January 5, 2007, at 9:00 a.m., shall be continued to Wednesday,
13 January 24, 2007, at 11:30 a.m.

14 IT IS FURTHER ORDERED that the time from January 5, 2007, through January 24, 2007,
15 should be excluded in accordance with the provisions of the Speedy Trial Act, 18 U.S.C. §§
16 3161(h)(8)(A) and (B)(iv) for adequate preparation of counsel and continuity of counsel. The
17 Court finds that the ends of justice served by the granting of the continuance outweigh the best
18 interests of the public and the defendant in a speedy and public trial and the failure to grant the
19 requested continuance would unreasonably deny counsel time necessary for effective preparation,
20 taking into account due diligence.
21

22 SO ORDERED.

23 DATED: Jan 8, 2007

24 
HONORABLE D. LOWELL JENSEN
25 United States District Judge
26

STIP. CONTINUING
CHANGE OF PLEA DATE